



May 1st, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Notice of Ex Parte in CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

On April 26th, 2017, Peter Hayes, CEO of VTCSecure, LLC, met with Eliot Greenwald Deputy Chief Disabilities Rights Office (DRO), Michael Scott Attorney-Advisor DRO and Karen Peltz Strauss Deputy Chief Consumer and Governmental Affairs Bureau to discuss Internet Protocol Captioned Telecommunications Service (IP CTS).

VTCSecure discussed VTCSecure's new Automated Speech Recognition (ASR) to Real Time Text (RTR) service with automatic and manual Communication Assistant takeover. The platform would allow calls to begin with a much cheaper, faster, ASR solution which could be automatically upgraded to an agent based on confidence levels and/or accuracy. The user would also have the option to click at any time to add an agent. Agents would be able to modify text or take over the conversation and re-voice the call while still editing. VTCSecure argued that direct ASR is much faster than current IPCTS methods which many users prefer over accuracy. With accuracy of ASR getting better and better everyday, VTCSecure believes the user should have the choice between the two methods. This could also save hundreds of millions of dollars by providing for a much cheaper reimbursement rate when ASR is used instead of an agent. The system could also provide better mobile location services for 911 calling.

VTCSecure also discussed future requirements for authentication and validation of IPCTS users. VTCSecure proposed a new, accurate and faster method for remotely authenticating/validating new users of IPCTS using its platform.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter Hayes", is written over the printed name.

Peter Hayes

CEO

VTCSecure, LLC

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